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JAMES E. SULLIVAN
PC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

2006 MAR -1 PM 1:12

UNITED STATES OF AMERICA : CRIMINAL NO.
: 1 : 06 CF 0036
: vs. : INFORMATION
: : 18 U.S.C. § 371
MICHAEL E. SULLIVAN :
WEBER

The United States Attorney for the Southern District of Ohio charges that:

COUNT 1
18 U.S.C. § 371
Conspiracy

From sometime after September 2002 to about August 2003, in the Southern District of Ohio, the defendant, **MICHAEL E. SULLIVAN**, did unlawfully, knowingly, and willfully combine, conspire, confederate, and agree with another person to commit a certain offense against the United States, that is, otherwise than as provided by law for the proper discharge of official duty, to directly or indirectly give to a public official then employed at the United States Environmental Protection Agency ("EPA") in Cincinnati, Ohio, a thing of value, for and because of an official act performed and to be performed by the public official, in violation of 18 U.S.C. § 201 (c)(1)(A), and during the course of and in furtherance of the conspiracy, the defendant and his co-conspirator committed the following overt acts:

1. that the defendant's co-conspirator, in his capacity as an EPA official, collected information about scientists and their specialities at EPA and caused his secretary to put the information into a data base, which he sent to the defendant, **MICHAEL E. SULLIVAN**;

2. that to the defendant's co-conspirator, pursuant to his authority as an EPA official, caused the hiring of a university which then contracted with the defendant, **MICHAEL E. SULLIVAN**, to pay him \$60,000 to develop a data base of EPA scientists and their specialties; and

3. that the defendant, **MICHAEL SULLIVAN**, thereafter paid to his co-conspirator, as an illegal gratuity, \$30,000 of the \$60,000 paid to the defendant by the university for substantially the same data base of EPA scientists and their specialties that the defendant's co-conspirator had previously developed and sent to the defendant.

In violation of 18 U.S.C. § 371.

GREGORY G. LOCKHART
United States Attorney


RALPH W. KOHNEN

Deputy Criminal Chief